

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**UNITED STATES OF AMERICA,**

**v.**

**AHMAD KAZZELBACH**

**Case No. 19-mj-150-SAG**

**CONSENT MOTION TO MODIFY RELEASE CONDITIONS**

The defendant, Ahmad Kazzelbach, by and through his undersigned counsel, respectfully moves this Honorable Court to modify his conditions of release to place him on a curfew, restricting him to his residence from 7:00 p.m. to 7:00 a.m., in lieu of the current condition of 24/7 home detention. The government and Pretrial Services consent to this request. In support of this motion, Mr. Kazzelbach states as follows:

1. On January 14, 2019, Mr. Kazzelbach was charged by criminal complaint with offenses pertaining to obtaining information from a protected computer, cyberstalking, and aggravated identity theft. Mr. Kazzelbach had an initial appearance on the complaint on January 22, 2019. He was released on conditions the same day.

2. Mr. Kazzelbach's current release conditions are very restrictive. They include location monitoring and a restriction to his residence except for medical and legal appointments, among other conditions. During his four months on pretrial supervision, Mr. Kazzelbach has been fully compliant with all conditions of release.

3. In light of Mr. Kazzelbach's good performance on pretrial release to date, the parties are in agreement that 24/7 home detention is no longer necessary and less restrictive conditions are now appropriate.

4. Undersigned counsel has conferred with AUSA Jeffrey Izant and with U.S. Pretrial Services Officer Kenneth Langston and both have stated that they consent to the proposed modification.

For all of these reasons, we respectfully request that the Court enter an order modifying Mr. Kazzelback's release conditions to remove the requirement of 24/7 home detention and replace it with a curfew from 7:00 p.m. to 7:00 a.m. A proposed order is attached.

Respectfully submitted,

JAMES WYDA  
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